

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

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TYNISHA WILLIAMS and	:	
SHAWN BEALER, both individually and	:	
on behalf of a class of others similarly	:	
situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	No. 1:09-CV-2991
	:	
THE CITY OF CLEVELAND,	:	The Honorable Benita Y. Pearson
	:	
Defendant.	:	
	:	

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**PLAINTIFF TYNISHA WILLIAMS' NOTICE OF MOTION FOR SUMMARY  
JUDGMENT AND PERMANENT INJUNCTION**

**PLEASE TAKE NOTICE THAT**, upon the affirmation of Elmer Robert Keach, III, with Exhibits, and the Plaintiff's Memorandum of Law, the Plaintiff hereby moves this Court for Summary Judgment against the Defendant, and for an Order providing a Permanent Injunction enjoining the City of Cleveland from continuing to physically delouse detainees at the Cleveland Workhouse and from continuing to strip search detainees in groups in the absence of appropriate privacy partitions. In the alternative, the Plaintiff seeks a preliminary injunction ordering this same relief. All briefing in this matter must be filed pursuant to the Court's scheduling order.

The Plaintiff hereby seeks oral argument from the Court on this motion.

Respectfully Submitted By:

/s Elmer Robert Keach, III

Dated: November 9, 2015

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